



FEDERAL ELECTION COMMISSION

Washington, D.C. 20463

SEP 28 2009

MEMORANDUM

TO: The Commission

FROM: Thomasenia P. Duncan
General Counsel

Ann Marie Terzaken
Associate General Counsel for Enforcement

BY: Mark Allen *MA*
Assistant General Counsel

Michael A. Columbo *MA*
Attorney

SUBJECT: MUR 6164 (Friends of Mike Sodrel, *et al.*) Factual and Legal Analyses

On September 11, 2009, the Commission approved, by a vote of 4-0, the recommendations of the Office of the General Counsel in its First General Counsel's Report in this matter. Commissioners McGahn and Weintraub were recused. The recommendations in the report included findings of no reason to believe or dismissal of all allegations in the complaint and to close the file. However, they did not include a recommendation to approve the factual and legal analyses that were attached to the report. In order to complete the disposition of this matter, we recommend on a 48-hour no-objection basis that the Commission re-open the file, approve the factual and legal analyses which we have also attached to this memorandum, and close the file.

RECOMMENDATIONS:

1. Re-open the file in this matter.
2. Approve the attached factual and legal analyses.
3. Close the file in this matter.

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